

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Chapter 7 Estate of Bernard L.
Madoff,

Plaintiff,

v.

ABN AMRO BANK N.V. (presently known
as NATWEST MARKETS N.V.),

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Lead Adv. Pro. No. 10-05354 (CGM)

STIPULATION AND ORDER

Plaintiff Irving H. Picard, as trustee (the “Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. § 78aaa-*lll*, and the chapter 7 estate of Bernard L. Madoff individually, and defendant ABN AMRO Bank N.V. (presently known as NatWest Markets N.V.) (“Defendant,” together with the Trustee, the “Parties”), by and through their respective undersigned counsel, hereby agree as follows:

WHEREAS, on May 15, 2023, Defendant answered the Consolidated Second Amended Complaint and asserted Counterclaims against the Trustee. ECF No. 268.

WHEREAS, the Parties have agreed to a schedule for litigation of Defendant's Counterclaims.

IT IS HEREBY STIPULATED AND AGREED that:

1. The Trustee shall file his motion to dismiss Defendant's Counterclaims on or before July 17, 2023.
2. Defendant shall file its opposition to the Trustee's motion to dismiss or amend its Counterclaims by or on August 24, 2023.
3. The Trustee shall file his reply in further support of his motion to dismiss by or on September 25, 2023.
4. This Stipulation is so ordered without prejudice to any future stipulations for extensions of time.
5. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic, or electronic copy of this Stipulation shall be deemed an original.

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Date: May 30, 2023
New York, New York

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for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the
Chapter 7 Estate of Bernard L. Madoff*

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*Attorneys for Defendant ABN AMRO Bank
N.V. (presently known as NatWest Markets
N.V.)*

Dated: May 31, 2023
Poughkeepsie, New York



/s/ Cecelia G. Morris

Hon. Cecelia G. Morris
U.S. Bankruptcy Judge